

Exhibit “B”

SUBIN ASSOCIATES, LLP
 Attorney for plaintiffs EHRENFELD
 By: Gene L. Chertock, Esq.
 291 Broadway, 9th Floor
 New York, NY 10007
 212-285-3800

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

-----X		
ESTHER EHRENFELD and ASHER	:	ECF CASE
EHRENFELD	:	
	:	<u>NOTICE OF DEPOSITIONS</u>
Plaintiff (s),	:	
-against-	:	07 Civ. 8559 (PKL)
	:	
THE UNITED STATES OF AMERICA and THE	:	
CITY OF NEW YORK	:	
	:	
Defendant (s),	:	
-----X		

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal rules of Civil Procedure, plaintiff Esther Ehrenfeld, by her attorney, Subin Associates, LLP, will take the deposition upon oral examination, to be recorded by stenographic means, of:

1) The Veterans Administration, New York Campus, New York Harbor Health Care Systems, 423 E. 23rd Street, New York, NY 10010. The person produced for deposition shall have knowledge of the procedures for maintenance, inspection and repair of the exterior of the 23rd Street facility, more specifically the sidewalks abutting the facility along 1st Avenue, as well as the actual maintenance, inspection and repair of said sidewalk for the years prior to 11/20/06. The witness shall produce at the deposition all written rules, regulations and procedures concerning inspection, all inspection, maintenance and repair records for the sidewalk in question and all records concerning plaintiff's accident.

The deposition will take place at the United States Attorney's Office, 86 Chambers Street, 3rd floor, New York, New York 10007 on **Thursday, May 22, 2008** at 2:00 p.m.

Dated: New York, New York
May 5, 2008

SUBIN ASSOCIATES, LLP.
Attorney for plaintiff EHRENFELD

By: GENE L. CHERTOCK, ESQ. (7052)
291 Broadway, 9th Floor
New York, NY 10007
212-285-3800

TO:

Carolina A. Fornos
Assistant United States Attorney
MICHAEL J. GARCIA
United States Attorney
Southern District of New York
86 Chambers Street
New York, NY 10007
(212) 637-2740

Craig Robert Koster, Esq.
NYC Law Department, Office of Corporation Counsel
Attorneys for CITY OF NEW YORK
100 Church Street
New York, NY 10007

Civil Docket # 07 civ 8559
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ESTHER EHRENFELD and ASHER EHRENFELD,

Plaintiff (s),

-against-

THE UNITED STATES OF AMERICA and THE CITY
OF NEW YORK,

Defendant (s),

NOTICE OF DEPOSITIONS

GENE L. CHERTOCK, ESQ.
SUBIN ASSOCIATES, LLP
Attorneys for Plaintiff(s)
Office and Post Office Address, Telephone
291 Broadway, 9th Floor
NEW YORK, NY 10007
TELEPHONE 285-3800
AREA CODE 212

"WE DO NOT ACCEPT SERVICE BY ELECTRONIC TRANSMISSION (FAX)"

To:
Attorney(s) for

Service of a copy of the within *is hereby admitted*
Dated,

.....
Attorney(s) for

SUBIN ASSOCIATES LLP
Attorneys for Plaintiff(s)
Office & PO Address & Telephone
291 Broadway, 9th Floor
New York, NY 10007
212 285 3856

File #15797